



Welcome to the Flight School Security Awareness Training for
Aircraft and Simulators

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Introduction

Welcome to the Flight School Security Awareness (FSSA) Training Module! The purpose of FSSA training is to raise general security awareness levels of employees working in the flight training industry. Employees in this industry must be able to question and respond appropriately to any behaviors or activities that may present a threat to aviation security.

In accordance with 49 CFR 1552, Flight Schools and Flight Training Centers are required to provide security awareness training to their employees. Under this legislation, Flight School and Flight Training Center operators have two choices, they can develop their own in-house training program in accordance with the guidelines set forth in 49 CFR 1552, or they may use this TSA program to meet the mandate. This program is a pro-active response from TSA to offer an alternative to each school having to develop their own program. Regardless of which method the operator chooses, both programs must meet the established mandates outlined in 49 CFR 1552.

This training module will provide you with the basic knowledge on indicators of suspicious activity and how suspicious activity should be reported. It will also include a variety of scenarios to test your knowledge on what you have learned and will conclude with recommended best practices. Upon completion of the training you will receive a printable certificate.

Security awareness allows us to take mindful and conscious measures to reduce the risks associated with suspicious behaviors that could lead to unlawful activity.

Security awareness also provides basic knowledge on what to look for around you and how to report suspicious activity.

Introduction (continued)

Due to the tragic events of September 11th, there has been an emphasis on those who work at airports and with flight school students to become the “eyes and ears” of the transportation and aviation industry.

- What does this mean?
- How do you become the “eyes and ears”?
- What behaviors or activities may be considered suspicious?
- What actions can you take to make your area more secure?

After completing the training on Flight School Security Awareness, you will be able to:

- Identify potential indicator behaviors that should raise suspicion.
- Decide what response or action, if any, is necessary to take for activities or behaviors that may be considered suspicious.
- Identify “Best Practices and Recommendations” to aid in increased security by reducing threats and illicit behavior and/or activities.

The Flight School Security Awareness training will cover the following topics:

- Actions
- Indicators
- Best Practices and Recommendations

This completes the Introduction to FSSA.

Actions

Security is everyone's responsibility. In today's world, it is better to question a situation than to wait for someone else to respond.

The following information will describe general accommodations and actions you can take to keep your facility more secure. This topic will also discuss reporting methods you should follow if you feel an action is suspicious.

There are some general accommodations you can make to help keep your facility more secure:

- Know your customers and business associates.
- Be aware of your surroundings and the activities of your students and customers.
- Don't be afraid to ask questions.
- Make no assumptions about who may or may not pose a threat.

There are also some general actions you can take to help keep your facility more secure:

- Report suspicious circumstances or unusual activity.
- Display proper identification, if required at your facility.
- Use proper entrances and exits.

There are four primary reporting methods:

- Question the individual.
- Report the suspicious activity to a supervisor or other facility manager.
- Contact local law enforcement.
- Contact the General Aviation (GA) hotline or Transportation Security Operations Center (TSOC) at (703) 563-3240.

Actions (continued)

- **NOTE:** The GA Hotline or Transportation Security Operations Center (TSOC) is a 24/7 operation staffed by TSA personnel who will document the reported item, collect your personal contact numbers and pass all of the information on to the appropriate regulatory office within the TSA. Your report will receive immediate attention by the agency to determine the severity of the action and the next steps to resolve the issue. This report will be followed up by an Aviation Security Inspector either in person or via telecom.

The reporting method you use depends on the level of suspicion and potential danger from the situation. Generally speaking, there is usually an initial contact you should make relative to the seriousness of the suspicious activity or event. Follow-on reporting activities after the initial report of the event may include a combination of reporting methods.

Questioning an individual:

- Helps you to gain more information.
- Determines if other forms of reporting are necessary. In some cases, behavior appearing suspicious is benign. In other situations, you may not be sure how suspicious the activity is until you talk to the person.

NOTE: Only question an individual if there appears to be no danger to yourself or other people.

When should you question an individual?

- This is a judgment call.
- Pay attention to your gut feeling.
- If you do not feel comfortable confronting the person, contact your supervisor or fellow employee.

Actions (continued)

When you question an individual:

- Introduce yourself to avoid the appearance of confrontation.
- Ask them to identify themselves - be insistent.
- Ask why they are in the area and what their purpose is in the area.

During the questioning:

- Greet the individual, introduce yourself.
- Ask them for their name.
- Ask them for identification - especially if in restricted areas.
- Ask them their purpose for being there.
- Ask if you can be of help or provide assistance.

Most importantly, know when to end the conversation if you feel uncomfortable. At this point, engage your supervisor. If the situation warrants, contact local law enforcement. Never jeopardize your safety or the safety of others.

Whenever any reporting is required, your supervisor should be informed. In some cases, it is only your supervisor who should be informed while in other situations, there may be follow-on actions required resulting in a combination of reporting methods to various activities.

The GA hotline or TSOC (703-563-3240) is available for reporting any suspicious activity. A call results in a record of the incident and as necessary an appropriate response. This is the most appropriate reporting mechanism for flight schools to document suspicious behavior or situations. This provides for a means of tracking trends or attempts to use aviation assets in unlawful activities. If you believe the event is of more significant nature you may want to consider contacting the GA Hotline or TSOC.

Actions (continued)

Situations posing an immediate threat to someone's safety should immediately be reported to local law enforcement, i.e., dialing 911.

If you feel an action is suspicious you should:

- Contact the appropriate level of authority.
- As applicable, contact your supervisor or other manager and brief them on the situation.
- Not discuss the situation with anyone other than authorized personnel.
- Report factual information – provide as many details as you can remember.
- Be prepared to answer additional questions by company personnel, law enforcement officials, or investigating officials.

This completes the topic on Actions.

Indicators

It is important for flight school and flight simulator instructors, employees, administrative staff, and other employees who have direct contact with students to be on the lookout for “suspicious” activity.

Suspicious activity may be defined as activity that creates uneasiness or uncertainty without being criminal or illegal.

The following information will describe indicators of suspicious activities that you should be aware of.

You should be on the look-out for indicators of suspicious activity, but be aware that suspicious activity may be the result of a person who may be:

- Feeling ill
- Having problems at home or school
- Nervous about taking tests
- Experiencing other atypical physiological conditions
- Having some other personal or physical situation causing the behavior

Suspicious activity may include, but is not limited to:

- Transient aircraft with unusual or unauthorized modifications.
 - Tape over the aircraft registration numbers.
 - Unusual adjustments to strengthen the wheel wells.
 - Other modifications to make the identification of the aircraft difficult or that indicate the aircraft has been used for other than normal operations.

Indicators (continued)

Suspicious activity may include, but is not limited to (continued):

- Unknown persons loitering for extended periods with no specific reason to be there.
 - By aircraft
 - In the Pilot's Lounge
- Pilots who appear to be under the control of another person.
- Persons wishing to rent an aircraft without presenting valid flight or medical certificates or identification.
- Persons who present seemingly valid flight or medical certificates but who do not display a corresponding level of aviation knowledge.
- Persons who seem unfamiliar with aviation procedures trying to rent an aircraft.
- Any pilot who makes threats or statements inconsistent with normal uses of aircraft.
- Events or circumstances that do not fit the pattern of lawful, normal activity at an airport or a flight school.
- Persons trying to access an aircraft through force.
 - Without keys
 - Using a tool or makeshift pry bar to gain entry into an aircraft
 - Unfamiliar persons on the flight line
- People or groups who keep to themselves.
- Members of your airport neighborhood who avoid contact and refrain from conversation with you or other airport tenants.
- Dangerous cargo or loads being loaded onto an aircraft.
- Students who are vague with verbal answers or when filling out their student application.
- Students who are overly concerned as to whether the application includes a background investigation.

Indicators (continued)

Suspicious activity may include, but is not limited to (continued):

- Students who continually want to fly over sensitive locations or critical infrastructures.
 - Nuclear facilities, power plants, dams, etc.
- Students who ask questions that do not seem relevant to the instruction.
- Students who seem interested in only one part of training or who leave the program prior to training completion.

NOTE: Students leaving the training may not be suspicious in and of itself; 60-70% of students will drop out of training prior to completion.

- Student attempting to pay with cash only.
- Students speaking secretively or evasively passing notes in an attempt to avoid drawing attention to themselves.
- Students who perspire excessively or who have excessive nervous energy.
- Student who is easily agitated.
- Any other activity that appears inconsistent with the intent to obtain full certification.

Note that any one of these signs may not be suspicious in and of itself. However, combinations of multiple signs may indicate a higher degree of suspicious activity than individual signs.

Also, realize that the indicators listed are not all inclusive. As the aviation and airline industry adapts and becomes more aware, those that wish us harm will adapt their approaches.

This completes the topic on Indicators.

Scenarios

Introduction to Scenarios

In life, we often find ourselves in situations causing us to take immediate action to counter the effects of actions imposed upon us by others. Sometimes the situations are critical. These can vary in form from an inconsiderate driver on a highway whose control of an automobile forces us to make a defensive driving maneuver or it could be an event in which a person in a restaurant suddenly passes out because of an airway obstruction causing us to take immediate, life-saving actions.

As you can see by the two examples, any action you take would have to be immediate and above all else, the most appropriate response for the given situation. This is an important factor considering that for the two examples, there are many actions a person could take to resolve the problem.

The same is also true in how an employee of a flight school or flight training center responds to persons and/or their actions that appear to be suspicious, irregular, illegal, odd, or just out-of-place. Therefore, it is important that you remember your first response should be immediate and appropriate given the situation.

The following exercises provide you with images of activities and accompanying scenarios that may or may not require you to take action. Because there are many possible solutions to any given scenario, we have limited the response options to: No action necessary; Question the individual; Inform a supervisor; and Contact local law enforcement.

For each scenario, you will be asked to determine what should be your **first** response and/or action. The response you choose should be based on the information provided.

Do not read into the scenario or the image provided. Whatever your response, the feedback provided will tell you which response is considered the most appropriate for the scenario.

Scenarios – Flight School with Airplanes

Question

You observe an individual you do not recognize working in the engine compartment of one of the flight school's aircraft. He is wearing no uniform and has no identification badge. Additionally, he has a toolbox open at his feet and he is taking tools from the box and using them in the engine compartment.

Answer

Your first action should be to question the individual. You may be able to determine if the mechanic is authorized (not all wear a uniform), if it is an airplane owned by the flight school, or if the situation warrants contacting your supervisor. If the situation warrants contacting your supervisor, they will investigate the situation further and handle the follow-on actions, i.e., contacting local law enforcement and/or contacting the GA hotline. If the individual appearing to work on the aircraft is not an authorized aircraft mechanic, contact local law enforcement and continue to monitor until they arrive. Finally, contact the GA hotline to report the incident.

Question

You notice a man with some type of instrument in his hand walking around one of the aircraft on the parking ramp. Upon further investigation you realize the man is using the instrument to jimmy the lock and pry the airplane door and window open.

Answer

Your first response should be to contact a supervisor. Any time an unknown stranger is seen near an airplane with a weapon or tool that can harm people or do damage to an aircraft constitutes a serious situation and requires immediate intervention. The supervisor will take appropriate follow-on actions which may include contacting local law enforcement and reporting the incident to the GA hotline.

Question

When entering the gates to the flight school training facility you see a man standing outside of the fence taking pictures. The man seems to be taking all sorts of pictures including aircraft taking off and landing, aircraft on the parking ramp, and photos of the hanger.

Answer

Your first response should be to question the individual. In many parts of the world, including the U.S., there are clubs and individuals that are aviation enthusiasts. Their hobby is simply capturing images of aircraft and tail markings. Additionally, many people interested in aviation or even tourists may stop to take pictures of aircraft taking off and landing. However, there is also the element which is taking the same type of images and using that information to track take off and landings of aircraft. While there is no way to determine who is who in this instance, the best response is to question the individual. If you feel the person(s) activities fall outside that of the hobbyist or aviation enthusiast, contact your supervisor. They will take appropriate follow-on actions which may include reporting the incident to the GA hotline.

Question

While walking on the flight line you see an unfamiliar man who appears to be altering an aircraft's registration number. Taking a closer look, you realize that he is using tape to cover-up and alter one of the numbers on the aircraft's registration. He has changed the "8" to look like a "0".

Answer

Your first response should be to contact a supervisor. Aircraft registration numbers that have been removed, changed, or altered should raise suspicion and be reported to a supervisor immediately. They will investigate the issue and take appropriate follow-on actions to ensure the proper authorities and/or agencies are notified, i.e., the GA hotline.

Question

During a routine aircraft walk-around inspection, you notice a plane on the flight line that has had its wheel wells strengthened. Further investigation shows that an additional bar has been welded on the undercarriage of the aircraft to each wheel of the plane. This aircraft is a typical, single propeller plane and is not commonly used for transporting heavy loads.

Answer

Your first response should be to contact a supervisor. A supervisor should be informed immediately to begin investigating the situation. Strengthening the wheel wells is an unusual modification that raises suspicion. This situation calls for further investigation before reporting to the GA hotline since there may be circumstances surrounding the situation.

Question

On the way out to your aircraft you notice an individual working on a plane next to yours. Curious, you look into the plane and watch as the man works beneath the aircraft's console. It looks as though the man is making alterations and changes to the wiring beneath the console.

Answer

Your first response should be to question the individual. If the individual provides strange responses to your questions you should then contact a supervisor. The supervisor will take appropriate follow-on actions which may include initiating an investigation until appropriate officials arrive and also contacting the GA hotline to report the incident, and possibly contacting local law enforcement if the situation warrants.

Question

Locking your plane up for the night, you happen to observe the wheels and undercarriage of a plane nearby. You see brush stuck in the wheel wells and splashes of dried mud on the undercarriage of the plane. This plane has definitely been landing in areas other than standard runways.

Answer

You should report this situation to your supervisor immediately. Since there is no one around, there is no immediate threat, so there is no need to bring other agencies into the situation yet. Your supervisor will begin an investigation to determine whether there is an acceptable reason for the shape of the wheels and underside of the aircraft. Once the investigation is started, there may be sufficient reason to bring other agencies into the situation, but that will be determined by your supervisor.

Question

You observe an individual walking around the parking ramp looking at various aircraft. You do not recognize him and you watch as he takes time to peer through the windows of the different aircraft.

Answer

Question the person before performing any other reporting activity. The situation raises suspicion, but the person may just be someone interested in aviation and aircraft. Upon questioning the person, you will gain further information to determine whether you need to report the situation to anyone else. Just by talking to the person, you may disrupt any suspicious activity and keep an incident from occurring since the person has been seen.

Question

A man approaches you at the Customer Service Counter wishing to rent an aircraft. He requests a plane for a two-hour joy ride to enjoy the weather. He seems to have strong aviation knowledge, but does not present you with valid or proper flight or medical certificates or identification.

Answer

Your first response should be to question the individual. There may be isolated instances in which a visitor to our country is not aware of the documents required to rent an airplane. In this case just explaining the documentation required is enough for them to understand they are not authorized under Federal regulations to rent an aircraft. However, there may also be the instance in which a person, even after having been advised of the policies, still attempts to convince you to rent them an airplane. Situations such as this clearly require the notification of a supervisor. From this point the supervisor should contact the GA hotline and if the situation warrants, also contact local law enforcement authorities.

Question

Walking through the Pilot's Lounge an individual that doesn't seem to belong there catches your eye. You hang around the lounge to watch the man to see if your instincts are correct. You observe that he is not filling out any paper work, working on a flight plan, or checking weather and does not engage in conversations with any of the instructors or other students. He appears to be loitering in the lounge with no specific reason for being there.

Answer

Your first response should be to question the individual. Ask the person if they require assistance. Determine which aircraft they flew or arrived in. Advise them the area is reserved for flight crew and flight planning activities only. Make a note of the person(s) description and their name(s) if you are able to get them. Be especially observant of their reaction to your questions and note any reactions you might consider suspicious. If they are leaving the airport by vehicle, attempt to observe the vehicle and make note of its tag number. Additionally, provide as much descriptive information as possible about the vehicle they arrived/departed in, i.e., make, model, year, color. Finally, inform a supervisor of the

situation and provide them with the information you obtained so that they can take follow-on actions including but not limited to contacting the GA hotline.

Question

A pilot approaches you at the rental desk to check on the availability of one of the aircraft. He appears nervous, jumpy and keeps looking over his shoulder at the gentleman behind him. You observe the man standing behind the pilot and notice that he is concentrating on the pilot and seems to be concealing something under his arms. You have reason to believe that the pilot is under the control of this man.

Answer

Your first response should be to contact local law enforcement. This is a serious situation requiring the immediate intervention of law enforcement personnel. Depending on the situation, it may be difficult to diagnose and not be immediately apparent to flight school employees. Therefore, each flight school employee's level of situational awareness, familiarity with established policies and programs and just knowing the pilot staff members becomes extremely important when determining that a pilot is under the control of another person. After contact with the local law enforcement agency has been made, the supervisor should contact the GA hotline to report the incident. Additional information is also available through the AOPA Airport Watch Program.

Question

An individual approaches you at the Customer Service Counter wishing to rent an aircraft. He presents seemingly valid flight and medical certificates, but needs a lot of help with the terminology when filling out some of the paper work. He also does not know the names of the different aircraft that he can rent or where he wants to fly. Some of his questions seem bizarre and his lack of knowledge of the various aircraft clearly shows that he does not have a corresponding level of aviation knowledge.

Answer

Your first response should be to question the individual. Question the person about their aeronautical experience and observe their behavior as each question is answered. Try to determine if the customer's answers are truthful or evasive, direct, nervous and/or hesitant? Observe the individual for obvious signs of nervous behavior and a lack of eye contact. What other types of aircraft have they flown? In what other parts of the country have they flown? Where did they receive their flight training? In what aircraft types have they trained? How long have they been flying? Why do they want to rent today? Where are they going? Inform them there must be an aircraft checkout ride with a company pilot before they can rent the plane and go alone. Depending on how the customer reacts to questions such as these, you may want to contact a supervisor and bring them and/or a chief pilot in on the conversation. They can help assess the individual's answers and level of knowledge. If the supervisor believes something is amiss, they should report the incident to the GA hotline.

Question

An individual trying to rent an aircraft wants to know what type of planes he can rent, how much they cost, and if they are already fueled. He seems unfamiliar with the aviation procedures and requirements when trying to rent an aircraft from this facility.

Answer

Your first response should be to question the individual. This may not be an uncommon occurrence if this person has never rented an aircraft, has not rented a plane recently, or who is newly licensed. It may be simply that more information is required of an individual desiring to rent an airplane in one location as opposed to another. By questioning the individual you should be able to make a reasonable determination that their intentions are honest as well as legal.

Question

When instructing one of your students on the cockpit instruments, your student says, “Do you think it would be possible to fly an aircraft into the Hoover Dam? Imagine all of the damage that would cause.” This is clearly a threat/statement inconsistent with normal aircraft use.

Answer

Your first response should be to contact local law enforcement. Remarks or statements inconsistent with normal aircraft use and/or statements of a threatening nature are not only inappropriate, but should also be taken seriously, even if made in jest. Therefore, it is appropriate to immediately contact local law enforcement authorities and report the incident. Additionally, the student should also be denied use of the aircraft for training and/or rental until the issue is discussed and resolved with school management.

Question

An individual approaches you to sign up for flying lessons. You ask him to fill out the appropriate application and to return it when it is completed. The individual returns the application but has left several areas blank. You inform the individual that he needs to complete all sections of the application but he refuses to do so.

Answer

Your first response should be to inform a supervisor. The completion of application forms is not optional, so any significant push-back or attempt by the student to register without having completed the necessary paperwork must be reported to the supervisor for follow-on action. Additionally, any U.S. citizen wishing to train in an aircraft must provide proof of citizenship and be willing to provide the information requested by the flight school. Non-U.S. citizens who apply for flight training must be approved by TSA before they can receive training.

Question

A student filling out an application is overly concerned as to whether the application includes a background check. He wants to know what the background check would entail, how far back in his history would they investigate, and who they might contact for information. He also wants to know when the background check investigation process would begin.

Answer

Your first response should be to inform a supervisor. The behavior is subjective in the amount of distress displayed by the student. Some individuals are naturally concerned about their privacy. Their concerns usually hinge on how much personal information must be provided, to whom it shall be provided, how will the information be protected, etc. However, since the events of 9/11 all commercial aircrew members are scrutinized and background checked. Any student objecting to or refusing a background check should raise mental warning flags requiring the immediate notification of a supervisor. Should such an incident occur, the supervisor may elect to take additional follow-on actions. U.S. Citizens are not required to undergo a background check; however, any foreign student voicing a concern would appear to not understand the new requirements of the Aviation Transportation Security Act (ATSA) which requires them to provide certain information to DHS for a risk assessment evaluation and approval to receive flight training in the US.

Question

You are giving a lesson on take-off procedures but the student is constantly asking questions that do not seem relevant to the instruction. Some of the questions include, "Would it be possible if we could fly over a nuclear power plant?" and "Are there any major bridges that we will be flying over?"

Answer

Your first response should be to inform a supervisor. Contacting the supervisor in this instance is a judgment call by the instructor over what may seem relevant in the course of instruction. Remember that students are encouraged to ask questions. However, if over time the instructor feels the student's focus is not 100% on the flight course or the student has ulterior motives by asking questions that do not relate to the subject being taught, the

instructor should consult with other instructors and supervisory staff to determine if a pattern of behavior exists that warrants closer examination.

Questions being described as odd or inappropriate for the instruction or even asked infrequently may not be readily apparent as a student with ulterior motives may be smart enough not to call undue attention to themselves. However, this behavioral pattern coupled with other similar types of “warning” behaviors discussed in previous and subsequent slides should prompt an immediate call to local law enforcement and the GA hotline.

Question

You have been making great progress with one of your students. You have completed training through the airwork, systems malfunction, and autopilot portion of the syllabus. In addition, you have completed several simulator lessons on take-off procedures and V1cuts. Today was to begin normal approach to landing procedures for your student, but you have learned that he has suddenly dropped out of flight training. It seems as if he was interested in only one part of the flight training program – getting the aircraft in the air and maintaining straight and level flight through the use of the autopilot and mode control panel.

Answer

Any student who is intensely interested in a single part or aspect of the training in large aircraft or is concentrating more on ground facilities than flight maneuvers; curiosity or frequent questions concerning bridges, dams, power grids, relay stations, power generation or nuclear facilities should be taken seriously. This type of behavior should be shared with other staff members, instructors, and supervisors. Additionally, instructors should closely monitor and scrutinize those parts of the training syllabus chosen for review or special emphasis. Consistently repeating specific sections of training where the student would have the ability to perfect certain skills should be reported to a supervisor. If these behaviors are followed by the sudden and unexplained departure of the student prior to completion of the program, immediately contact the supervisor. They will immediately invoke follow-up actions by contacting appropriate authorities and the General Aviation (GA) Hotline or Transportation Security Operations Center (TSOC) at (703-563-3240).

Once the supervisor has been given all available information on the student, they should immediately contact local law enforcement and the General Aviation (GA) Hotline or Transportation Security Operations Center (TSOC) at (703-563-3240). If the student is an alien in this country on a visa, the supervisor should provide this information to the local law enforcement authorities as well so they can inform the Bureau of Immigration and Customs Enforcement.

Question

An individual approaches you about taking flying lessons so she can get her pilots license. You sit down with the woman and explain the procedures and time frame for the flight school. After filling out the appropriate paperwork she hands you a wad of cash to pay for all lessons in advance.

Answer

In this scenario your first response should be to question the student. Do this casually, “My, that certainly is a lot of cash to be carrying around?” or, “Don’t you have a bank account, or a checking account?” Inform a supervisor of the presence of a lot of cash on the premises. What constitutes “a lot of cash” should be determined locally.

Keep in mind this is a situation dependent scenario. For example, if the student is only enrolling in a private pilot course, the total fee for this would normally be less than \$5,000. Some flight schools offer discounts for prepayment or buying “blocks” of airplane time. So, it may not be unusual for a person to pay in cash. However, the situation should be viewed with greater care if the student is enrolling in a complete professional pilot course.

A complete professional pilot training course may include training all the way through to a Commercial Flight Instructor (CFI) rating with perhaps a jet transition and high-altitude endorsement. Total tuition costs for such a course may exceed \$40– 50K per student. If a student brings that much cash in all at once and prepays the entire cost of the course there is not only reason for concern, but there is also reason to immediately contact your supervisor. A cash out-lay of this magnitude by a single individual should raise red flag warnings that something may be amiss. It is better to err on the side of caution.

Question

A student is sitting in the Pilot's Lounge and you notice that rather than interacting with other students or instructors he is sitting by himself.

Answer

Question the individual; be friendly and see if it is just due to shyness or being new to the school. In time, this shyness should diminish as the student begins to interact with the flight school staff and other students. However, if over time there doesn't seem to be any interest on the student's part to interact with the instructional staff, inform your supervisor. This behavior may be indicative of a person attempting to conceal their true purpose for being enrolled in the flight school. Listed below are things to keep in mind when you encounter this type of behavior.

- 1) It may be benign and an indication the student is shy and reserved.
- 2) It can be observed and substantiated by both administrative and/or instructor personnel.
- 3) Introverted behavior may just be typical of the student's culture.
- 4) This type of behavior may be an indication the student is lying or has something to hide.

If, through your observations and interaction with the student you feel the individual is attempting to conceal information that could lead to an ulterior motive, you should compare notes on the student to see if anyone has different information concerning the behavior, and inform your supervisor immediately. The supervisor will then take any follow-on actions.

Question

You observe that one of your students is perspiring excessively and has excessive nervous energy. He is sweating through his shirt and occasionally lets out nervous laughter. This is unusual because he does not seem to be in a stressful situation as he is just sitting in the lounge area.

Answer

Your first response should be to question the individual. Many things may be attributed to such physiological conditions and the observed human behavior. Extreme perspiration and/or nervousness are but two such factors. In most cases these are perfectly normal responses to new situations, stress, and even to a learning environment. In some cases, they can also be indicators of more serious conditions, i.e., medical or psychological. The only way you will be able to determine if these types of reactions are normal for the individual is to question them. Determine whether or not the student is ill. You may also want to ask if this is a normal response for them in similar situations, it may even be that it is a physiological trait. Additionally, you may want to inform a supervisor or consult with co-workers and other instructors about the noted behavior to determine if similar observations have been made. These “behaviors” may be beyond the student’s control; they may be benign, especially if it is a “written test” or “check ride” day; or they may truly be indicators that the student is concealing motives and/or intentions.

Again, these behaviors will need to be compared to other indicators and student actions before a conclusion can be drawn.

Question

An individual who is in-between lessons approaches you at the customer service center. He asks you some questions about future lessons but he appears very agitated. You try to answer his questions but he snaps at you and constantly interrupts you. Something is obviously bothering him.

Answer

Your first response should be to question the individual. In this scenario, the first order of business is to determine what is bothering the student. Their response(s) to your questions will help you determine if the training should continue, be rescheduled for a later date/time,

or if you need to inform your supervisor or contact your local law enforcement agency because the situation is more volatile than first suspected. When questioning the individual, questions and/or questioning techniques should be directed at the exhibited behavior deemed suspicious or questionable. It could be the individual is just having a bad day, i.e., student's own frustration based on their personal assessment of their ability and performance, feeling like they've reached a learning plateau, just a bad training day, etc.

Scenarios – Flight Training Center with Simulators

Question

An individual approaches you at the Rental Desk wishing to rent simulator time. He requests the simulator for familiarization training. He seems to have strong aviation knowledge, but does not present you with valid or proper airmen certificates or identification or proof of U.S. Citizenship.

Answer

Your first response should be to question the individual. There may be isolated instances in which a visitor to our country is not aware of the documents required to rent simulator time. In this case just explaining the documentation required is enough for them to understand they are not authorized under Federal regulations to rent simulation time. Since most flight simulators represent aircraft with a Maximum Take-off Weight (MTOW) of 12,500 lbs or more, non-U.S. citizens are required to undergo a risk assessment by TSA prior to training. However, there may also be the instance in which a person, even after having been advised of the policies and regulations, still attempts to convince you to rent them simulator time. Situations such as this clearly require the notification of a supervisor. From this point the supervisor should contact the General Aviation (GA) Hotline or Transportation Security Operations Center (TSOC) (703-563-3240) and if the situation warrants, also contact local law enforcement authorities.

Question

Walking through the student lounge an individual that doesn't seem to belong there catches your eye. You hang around the lounge to watch to see if your instincts are correct. You observe that the man is not studying or filling out any paper work and does not engage in conversations with any of the instructors or other students. He just seems to be loitering in the lounge with no specific reason for being there.

Answer

Your first response should be to question the individual. Ask the person if they require assistance. Advise them the area is reserved for student training only. Make a note of the person(s) description and their name(s) if you are able to get them. Be especially observant

of their reaction to your questions and note any reactions you might consider suspicious. If they are leaving the training center by vehicle, attempt to observe the vehicle and make note of its tag number. Additionally, provide as much descriptive information as possible about the vehicle they arrived/departed in, i.e., make, model, year, color. Finally, inform a supervisor of the situation and provide them with the information you obtained so that they can take follow-on actions including but not limited to contacting the General Aviation (GA) Hotline or Transportation Security Operations Center (TSOC) (703-563-3240).

Question

An individual approaches you at the Rental Desk wishing to rent simulator time. The individual presents seemingly valid airmen certificates, but needs a lot of help with the terminology when filling out some of the paper work. He is unsure of how much time he needs to rent and does not know which type of simulator he wants to train in. Some of his questions about the various simulators seem bizarre and clearly show that he does not have a corresponding level of aviation knowledge.

Answer

Your first response should be to question the individual. Question the person about their aeronautical experience and observe their behavior as each question is answered. Ask the individual for proof of U.S. Citizenship. Try to determine if the customer's answers are truthful or evasive, direct, nervous and/or hesitant? In what simulator types have they trained? Why do they want to rent simulator time today? What other types of aircraft have they flown? In what other parts of the country have they flown? Where did they receive their flight training? How long have they been flying? Observe the individual for obvious nervous behavior and lack of eye contact. Depending on how the customer reacts to questions such as these, you may want to contact a supervisor and bring them and/or a chief pilot in on the conversation. They can help assess the individual's answers and level of knowledge. If the supervisor believes something is amiss, they should report the incident to the General Aviation (GA) Hotline or Transportation Security Operations Center (TSOC) (703-563-3240).

Question

An individual wishing to rent simulator time wants to know what type of simulators are available for rent, how much they cost, and if he needs to be accompanied by an instructor. This individual seems unfamiliar with aviation training center procedures and requirements when trying to rent simulator time from this facility.

Answer

Your first response should be to question the individual. This may not be an uncommon occurrence if this person is newly rated in large aircraft has never rented simulator time. If the individuals have not rented simulator time recently, they may be unfamiliar with the new regulations for flight training of non-U.S. Citizens or the requirements to establish U.S. Citizenship. It may be simply that more information is required of an individual desiring to rent simulator time in one location as opposed to another. By questioning the individual you should be able to make a reasonable determination that their intentions are honest as well as legal.

Question

When instructing one of your students on cockpit procedures and systems instrumentation, he suddenly says, "Do you think it would be possible to fly an aircraft into the Hoover Dam? Imagine all of the damage that would cause." This is clearly a threat/statement inconsistent with normal aircraft use.

Answer

Your first response should be to contact local law enforcement. Remarks or statements inconsistent with normal aircraft use and/or statements of a threatening nature are not only inappropriate, but should also be taken seriously, even if made in jest. Therefore, it is appropriate to immediately contact local law enforcement authorities and report the incident to a supervisor for follow-on actions. Additionally, the student should be denied use of the simulator for flight training and/or denied simulator rental privileges until the matter is resolved. Supervisors are also encouraged to contact the General Aviation (GA) Hotline or Transportation Security Operations Center (TSOC) and report incidents of this nature.

Question

An individual approaches you to sign up for simulator lessons. You ask him to fill out the appropriate application and to return it when it is completed. He returns the application but has left several areas blank. You inform him that he needs to complete all sections of the application but he refuses to do so.

Answer

Your first response should be to inform a supervisor. The completion of application forms is not optional, so any significant push-back or attempt by the student to register without having completed the necessary paperwork must be reported to the supervisor for follow-on action. Additionally, any U.S. citizen wishing to train in a simulator must provide proof of citizenship and be willing to provide the information requested by the flight training center. Non-U.S. citizens who apply for flight training must be approved by TSA before they can receive training.

Question

A student filling out an application is overly concerned as to whether the application includes a background check. He wants to know what the background check would entail, how far back in his history would they investigate, and who they might contact for information. He also wants to know when the background check investigation process would begin.

Answer

Your first response should be to inform a supervisor. The behavior is subjective in the amount of distress displayed by the student. Some individuals are naturally concerned about their privacy; however current government regulations require a background investigation on all non-U.S. Citizens. Their concerns usually hinge on how much personal information must be provided, to whom it shall be provided, how will the information be protected, etc. However, since the events of 9/11 all commercial aircrew members are scrutinized and background checked. Any student objecting to or refusing a background check should raise mental warning flags requiring the immediate notification of a supervisor. Should such an incident occur, the supervisor may elect to take additional follow-on actions. U.S. citizens are not required to undergo a background check; however,

any foreign student voicing a concern would appear to not understand the new requirements of 49 U.S.C. 44939, which requires them to provide certain information to DHS for a risk assessment evaluation and approval prior to receiving flight training in the US.

Question

You are giving a lesson on take-off procedures but the student is constantly asking questions that do not seem relevant to the instruction. Some of the questions include, “When we get into the simulator, will we be able to fly over any major U.S. cities and bridges?” Or, “Do you think we could fly over the Golden Gate Bridge?” Or, “Does the simulator have a daylight visual model of New York City or of Washington, DC?”

Answer

Your first response should be to inform a supervisor. Contacting the supervisor in this instance is a judgment call by the instructor over what may seem relevant in the course of instruction. Remember that students are encouraged to ask questions. However, if over time the instructor feels the student’s focus is not 100% on the flight course or the student has ulterior motives by asking questions that do not relate to the subject being taught, the instructor should consult with other instructors and supervisory staff to determine if a pattern of behavior exists that warrants closer examination.

Questions being described as odd or inappropriate for the instruction or even asked infrequently may not be readily apparent as a student with ulterior motives may be smart enough not to call undue attention to themselves. However, this behavioral pattern coupled with other similar types of “warning” behaviors discussed in previous and subsequent slides should prompt an immediate call to local law enforcement and the General Aviation (GA) Hotline or Transportation Security Operations Center (TSOC) (703-563-3240).

Question

You have been making great progress with one of your students. You have completed training through the airwork, systems malfunction, and autopilot portion of the syllabus. In addition, you have completed several simulator lessons on take-off procedures and V1 cuts. Today was to begin normal approach to landing procedures for your student, but you have learned that he has suddenly dropped out of flight training. It seems as if he was interested in only one part of the flight training program - getting the aircraft in the air and maintaining straight and level flight through the use of the autopilot and mode control panel.

Answer

Your first response should be to inform a supervisor. Any student who is intensely interested in a single part or aspect of the training in a large aircraft, or is concentrating more on ground facilities than flight maneuvers; curiosity or frequent questions concerning bridges, dams, power grids, relay stations, power generation or nuclear facilities should be taken seriously. This type of behavior should be shared with other staff members, instructors, and supervisors. Additionally, instructors should closely monitor and scrutinize those parts of the training syllabus chosen for review or special emphasis. Consistently repeating specific sections of training where the student would have the ability to perfect certain skills should be reported to a supervisor. If these behaviors are followed by the sudden and unexplained departure of the student prior to completion of the program, immediately contact the supervisor. They will immediately invoke follow-up actions by contacting appropriate authorities and General Aviation (GA) Hotline or Transportation Security Operations Center (TSOC) (703) 563-3240.

Once the supervisor has been given all available information on the student, they should immediately contact Local Law Enforcement and the General Aviation (GA) Hotline or Transportation Security Operations Center (TSOC). If the student is an alien in this country on a visa, the supervisor should provide this information to the local law enforcement authorities as well so they can inform the Bureau of Immigration and Customs Enforcement.

Question

An individual approaches you to enroll in flight training so she can get an aircraft type rating. You sit down with her and explain the process and procedures and time required for the simulation training and the rating checkride. After filling out the appropriate paperwork she hands you a wad of cash to pay for all lessons in advance.

Answer

In this scenario your first response should be to question the student. Do this casually, “My, that certainly is a lot of cash to be carrying around?” or, “Don’t you have a bank account, or a checking account?”

Inform a supervisor of the presence of a lot of cash on the premises. What constitutes “a lot of cash” should be determined locally. Keep in mind this is a situation dependent scenario. For example, if the student is only enrolling in a recurrent training course, the total fee for this may be less than \$5,000. Some flight training centers offer discounts for prepayment or for training multiple crewmembers concurrently. So, it may not be unusual for a person to pay in cash. However, the situation should be viewed with greater care if the student is enrolling in an initial training course for an ATP and type rating.

Total tuition costs for an initial type rating may exceed \$15-20K per student. If a student brings that much cash in all at once and prepays the entire cost of the course there is not only reason for concern, but there is also reason to immediately contact your supervisor. A cash out-lay of this magnitude by a single individual should raise red flag warnings that something may be amiss. It is better to err on the side of caution. Plus, any foreign national pilot bringing that much currency into the country would also have been required to declare and document the existence of an amount over \$10,000 with U.S. Customs.

Question

A student is sitting in the Student’s Lounge and you notice that rather than interacting with other students or instructors he is sitting by himself.

Answer

Question the individual; be friendly and see if it is just due to shyness or being new to the school. In time, this shyness should diminish as the student begins to interact with the

schoolhouse staff and other students. However, if over time there doesn't seem to be any interest on the student's part to interact with the instructional staff, inform your supervisor. This behavior may be indicative of a person attempting to conceal their true purpose for being enrolled in the flight training center. Listed below are things to keep in mind when you encounter this type of behavior.

- 1) It may be benign and an indication the student is shy and reserved.
- 2) It can be observed and substantiated by both administrative and/or instructor personnel.
- 3) Introverted behavior may just be typical of the student's culture.
- 4) This type of behavior may be an indication the student is lying or has something to hide.

If, through your observations and interaction with the student you feel the individual is attempting to conceal information that could lead to an ulterior motive, you should compare notes on the student to see if anyone has different information concerning the behavior, and inform your supervisor immediately. The supervisor will then take any follow-on actions necessary.

Question

You observe that one of your students is perspiring excessively and has excessive nervous energy. He is sweating through his shirt and occasionally lets out nervous laughter. This is unusual because he does not seem to be in a stressful situation as he is just sitting in the lounge area.

Answer

Your first response should be to question the individual. Many things may be attributed to such physiological conditions and the observed human behavior. Extreme perspiration and/or nervousness are but two such factors. In most cases these are perfectly normal responses to new situations, stress, and even to a learning environment. In some cases, they can also be indicators of more serious conditions, i.e., medical or psychological. The only way you will be able to determine if these types of reactions are normal for the individual is to question them. Determine whether or not the student is ill. You may also

want to ask if this is a normal response for them in similar situations, it may even be that it is a physiological trait. Additionally, you may want to inform a supervisor or consult with co-workers and other instructors about the noted behavior to determine if similar observations have been made. These “behaviors” may be beyond the student’s control; they may be benign, especially if it is a “written test” or “check ride” day; or they may truly be indicators that the student is concealing motives and/or intentions.

Again, these behaviors will need to be compared to other indicators and student actions before a conclusion can be drawn.

Question

An individual who is in-between lessons approaches you at the customer service center. He asks you some questions about future lessons but he appears very agitated. You try to answer his questions but he snaps at you and constantly interrupts you. Something is obviously bothering him.

Answer

Your first response should be to question the individual. In this scenario, the first order of business is to determine what is bothering the student. Their response(s) to your questions will help you determine if the training should continue, be rescheduled for a later date/time, or if you need to inform your supervisor or contact your local law enforcement agency because the situation is more volatile than first suspected. When questioning the individual, questions and/or questioning techniques should be directed at the exhibited behavior deemed suspicious or questionable. It could be the individual is just having a bad day, i.e., student's own frustration based on their personal assessment of their ability and performance, feeling like they've reached a learning plateau, just a bad training day, etc.

Best Practices and Recommendations

This topic provides Best Practices and Recommendations you should follow to help keep your facility, yourself, and others more secure. For simplicity these recommendations are generic to both flight schools and flight training centers. Some of these may or may not be applicable to your facility.

Make your facility more secure by:

- Posting local law enforcement contact information.
- Posting the General Aviation (GA) Hotline or Transportation Security Operations Center (TSOC) number (703-563-3240).
- Developing POC contact cards for employees to carry.
- Creating employee, student and visitor ID badges where applicable.
- Identifying which areas should be restricted to unknown individuals.

When a student applies for flight training, you must determine whether he or she is a U.S. citizen or national.

- Verify identification and citizenship.
 - U.S. Passport
 - U.S. Birth certificate
 - U.S. Naturalization document

If a student is an alien, you must comply with TSA notification and approval requirements at 49 CFR Part 1552.

NOTE: A driver's license does not establish U.S. Citizenship.

Enrollment:

- Ensure enrollment applications for students under the age 18 are signed by the students' parent or legal guardian.
- Establish a parents and legal guardian identification and verification process for students under the age 18 at flight schools and flight training centers.

- Copy and maintain the appropriate initial documentation to include a photo of the student and a copy of the student's airmen certificates for a minimum of five years following the completion of the training. In addition to the flight certificates, for foreign students maintain a legible photo copy of the passport and visa and the document giving approval to train that was received by the TSA.

NOTE: If any personal identifier information is maintained, you are required to follow the Privacy Act rules and regulations.

- Require all incoming students to complete a company-approved application and have the student update it should this information change during the course of instruction. To the greatest extent possible, verify the validity and authenticity of the information.
 - Driver's license
 - Birth certificate
 - Passport
 - Bank from where training funds are released, if applicable
 - Employment status
 - Work address
 - Home address
 - Work and home telephone numbers
- Provide law enforcement with the student's driver's license information for verification.
- Interview prospective students to:
 - Determine students' goals or objectives, and
 - Identify past experiences.
 - Previous flight experience
 - Previous schools attended
- Determine the students' legitimacy and sincerity.

Best Practices and Recommendations (continued)

Limit student pilot (pre-solo) access to aircraft keys.

- Consider having primary student pilots, prior to first solo flight, check in with a specific employee before allowing access to a parked aircraft.
 - The intent is to have an opportunity to observe and assess student behavior prior to uncontrolled access to the aircraft.
- Establish a key control program.
 - Have the instructor or other employee open the aircraft door and retain possession of the key during the student's aircraft pre-flight inspection.

Establish positive identification of student pilots before every flight lesson. This is recommended because students may not have the same instructor for every lesson.

- If students have more than one instructor, introduce each instructor initially.
- Create a class roster so employees know the current enrollment.

Establish the legitimacy of pilots or companies requesting to dry lease simulator time from your facility. Require formal requests be made via fax and on company letterhead.

Research the company via the internet or aviation directories to confirm the existence of that company.

Assign one or two regular instructors to the student. These instructors should share information on behavioral peculiarities or patterns and/or unusual questions posed during training. These peculiarities and questions should be documented in the student's file and shared with appropriate personnel.

Ground school instructors should conduct a hand-off briefing with the flight instructors (airplane or simulator) to discuss any peculiar or unusual behavior displayed by their students prior to the student progressing to the next phase of training.

Best Practices and Recommendations (continued)

For questionable, suspicious or peculiar behavior:

- The instructor should notify management for resolution.
- Management should determine whether to suspend student flight privileges.
- Management should contact either the GA Hotline or TSOC.

Appropriately secure unattended aircraft at all times. Consider taking additional security measures, such as:

- Prop locks
- Tie down locks
- Throttle locks
- Flight control locks
- Lock all aircraft access doors/panels
- If aircraft is kept in hangar, lock hangar doors

Establish procedures for securing aircraft at cross-country destinations and interim stops.

Ensure appropriate physical security:

- Ensure appropriate signage designating secure area exists, if applicable.
- Discuss physical security with employees.
 - Student training facilities and required display of ID badges
 - Aircraft hangars
 - Parking ramp areas
 - Onsite security force, if applicable
 - Video surveillance and who monitors it, if applicable
 - Secure access to flight simulators and other training devices

This completes the topic on Best Practices and Recommendations.

Summary

Congratulations! You have just completed the Flight School Security Awareness training.

You are now able to:

- Identify potential indicator behaviors that should raise suspicion.
- Decide what response or action, if any, is necessary to take for activities or behaviors that may be considered suspicious.
- Identify “Best Practices and Recommendations” to aid in increased security by reducing threats and illicit behavior and/or activities.

Remember:

- Security awareness allows us to take mindful and conscious measures to reduce the risks associated with suspicious behaviors that could lead to unlawful activity.
- Suspicious activity may be defined as activity that creates uneasiness or uncertainty without being criminal or illegal.
- Certain activities and/or behaviors in and of themselves may not be suspicious. However, combinations of multiple signs may indicate a higher degree of suspicious activity than individual signs.
- As the airline industry adapts and becomes more security conscious, those that wish us harm will also adapt their methods in an effort to offset our security awareness defensive gains.
- There are four methods for reporting suspicious activity:
 - Question the individual
 - Report the suspicious activity to a supervisor or other facility manager
 - Contact local law enforcement
 - Contact the General Aviation (GA) hotline or Transportation Security Operations Center (TSOC) (703-563-3240) for Flight Training Centers

Summary (continued)

NOTE: The GA Hotline or TSOC is a 24/7 operation staffed by TSA personnel who will document the reported item, collect your personal contact numbers and pass all the information on to the appropriate regulatory office within TSA. Your report will receive immediate attention by the agency to determine the severity of the action and the next steps to resolve the issue. This report will be followed up by an Aviation Security Inspector either in person or via telecom.

Remember:

- Individuals wishing to do us harm live all over the world and are very diverse in their demographics, i.e., sex, age, political beliefs, culture, financial status, religions, and the list goes on. Therefore, it is important that your focus be on the observable elements of a person's actions and/or their behaviors, not their physical characteristics.

Remember (continued):

- In some cases there may not be apparent indicators, but you may have an uneasy feeling about a situation. Share these feelings with other staff members: they could be indicators of something that leads to a security risk. The better you know your students, the easier it will be to identify suspicious activity.

To be the eyes and ears of the aviation industry, those working with aviation students must learn to identify and separate activities and behavior from those considered normal versus suspicious in order to provide security and safety within your facilities. Your efforts help provide a safer and more secure industry for everyone.

Remain Vigilant - Identify and promptly report suspicious behavior and/or activity.